

KEVIN J. KEATING

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Of Counsel
Stefani Goldin, Esq.

Paralegal
Colleen Fenton

ATTORNEY AT LAW
666 OLD COUNTRY ROAD
SUITE 501
GARDEN CITY, NEW YORK 11530-2004
(516) 222-1099
Fax: (516) 683-8410
www.kevinkeatinglaw.com

MANHATTAN OFFICE:
40 WALL STREET
28TH FLOOR
NEW YORK, N.Y. 10007
(BY APPT. ONLY)

September 15, 2014

VIA ECF

Honorable Sandra J. Feuerstein
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Munteanu
Ind. CR12-0698

Dear Judge Feuerstein:

As you are aware, I am attorney for Mr. Munteanu in the captioned matter which is scheduled to proceed to trial on October 6, 2014. My review of the discovery materials in this case reveals that it is expected that the government will call numerous witnesses in its case in chief and introduce in evidence dozens of exhibits.

With this, I write to respectfully request that Your Honor issue an Order directing the government to produce all 3500 material to me by September 29, 2014. This schedule will allow me to adequately prepare for trial in this matter.

Thank you for your consideration.

Very Truly Yours,


KEVIN J. KEATING

cc: Michael P. Robotti, Esq.
Assistant United States Attorney

Clerk of the Court

SO ORDERED:

HON. SANDRA FEUERSTEIN